



WELFARE-TO-WORK

HEALTH AND HUMAN SERVICES AGENCY



ALL-COUNTY INFORMATION NOTICE
Number: I-73-00

INFORMATION BULLETIN
Number: WB00-33

Date: July 26, 2000
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TO: LOCAL WORKFORCE INVESTMENT AREAS
WELFARE-TO-WORK 15 PERCENT SUBGRANTEES
DOL WELFARE-TO-WORK 25 PERCENT SUBGRANTEES
COUNTY WELFARE DIRECTORS
COUNTY CalWORKs WELFARE-TO-WORK COORDINATORS
COUNTY NON-CUSTODIAL PARENT COORDINATORS
COUNTY CalWORKs PROGRAM SPECIALISTS
FOSTER CARE INDEPENDENT LIVING PROGRAM COORDINATORS
FAMILY SUPPORT/CHILD SUPPORT PROGRAM ADMINISTRATORS
CALIFORNIA DEPARTMENT OF SOCIAL SERVICES STAFF
EDD EXECUTIVE STAFF
WID STAFF

SUBJECT: DOL QUESTIONS AND ANSWERS ON THE 1999 WtW GRANT AMENDMENTS

The Department of Labor (DOL) has posted to its Welfare-to-Work (WtW) Grant Web site, <http://wtw.doleta.gov>, questions and answers regarding the new eligibility and allowable activity requirements related to the 1999 WtW Grant program amendments established with the passage of H. R. 3424. The WtW Grant questions and answers (Q&A) help to clarify the effective date for implementing the new eligibility criteria and allowable activity provision.

As previously stated in a joint bulletin (All-County Information Notice [ACIN] I-21-00 and WtW Information Bulletin WB00-13) issued by the California Department of Social Services (CDSS) and the Employment Development Department (EDD) on March 6, 2000, the WtW Grant amendments had staggered implementation dates. The new eligibility requirements went into effect on January 1, 2000, for the DOL 25 Percent Competitive Grants, July 1, 2000, for non-federal and State matching funds, and October 1, 2000, for the 85 and 15 percent formula grants. However, with the issuance of the DOL Q&A, the 85 and 15 percent formula grants now have some latitude to begin using the new eligibility criteria effective July 1, 2000.

The DOL Q&A E29 states that the new eligibility criteria takes effect on July 1, 2000, and supercedes the old eligibility criteria. Therefore, any new individuals enrolled into the WtW Grant program beginning July 1, 2000, must be eligible under the new criteria. Individuals meeting **only** the old criteria would not be eligible and could not be enrolled in the WtW Grant program. Due to the less restrictive guidelines contained in the WtW Grant amendments, most individuals eligible under the old criteria will be eligible under the new criteria. One exception is noncustodial parents (NCPs) who must meet new

eligibility criteria such as unemployed, underemployed, or having difficulty in paying child support obligations. More information regarding NCPs is contained in the attachment.

Although 85 and 15 percent formula grantees and County Welfare Departments must begin using the new eligibility criteria July 1, 2000, there is a limitation. Entities may expend 85 and 15 percent formula funds on the new eligibles prior to October 1, 2000, if the individuals meet both the "old" and the "new" eligibility criteria. The DOL Q&A E31 states that the "1999 amendments only restrict expenditures from allotments for individuals who would not have been eligible before July 1, 2000." The intent of this restriction is to prevent the outlay of federal WtW Grant formula funds until October 1, 2000. The DOL further states that operating entities may incur unpaid obligations within the normal course of business, provided that the timing of those transactions ensures that the drawdown of federal WtW Grant formula funds to liquidate the obligations will not occur until October 1, 2000.

Entities using non-federal or State WtW Grant matching funds must also use the new eligibility criteria beginning July 1, 2000. However, these funds do not have the same expenditure restrictions between July 1 and October 1, 2000, as the 85 and 15 percent formula funds. Individuals enrolled into the program using non-federal or State WtW Grant matching funds must meet only the "new" eligibility criteria.

Attachment contains a side by side matrix of the "old" and "new" WtW Grant eligibility requirements. This matrix can be used as a checklist to assist with determining whether WtW Grant formula funds can be expended on new WtW Grant enrollees prior to October 1, 2000.

Several of the elements contained in the WtW Grant amendments will require further definition or clarification. The CDSS and EDD will coordinate at the State level to issue additional guidance along with revisions to the WtW eligibility directive WD00-1 and ACIN I-56-00. A presentation on the WtW Grant amendments will be provided by DOL at the WtW Grant regional forums. The forums are scheduled for July 14 in San Francisco, July 19 in Redding, July 26 in Fresno, August 2 in Ontario, and August 9 in Sacramento. Please see ACIN 1-65-00 and WB00-29 for additional information regarding the forums.

If you have any questions, please contact Pat Loader, CDSS Employment Bureau, at (916) 654-1770 or Don Migge, EDD WtW Coordination Unit at (916) 654-6206.

***Original signed by Suzanne Nobles
for Charr Lee Metsker on 7/25/00***

CHARR LEE METSKER
Chief
Employment and Eligibility Branch, DSS

***Original signed by Jim Curtis
on 7/25/00***

JIM CURTIS
Chief
Program Development and Management
Division, EDD

Attachment

Welfare-to-Work Participant Eligibility Provisions

Information provided in the following tables is for entities using WtW Grant formula funds. For individuals meeting only the "NEW" eligibility criteria described in Tables 1 through 5, only non-federal or State WtW Grant matching funds may be expended to provide services and activities through September 30, 2000.

TABLE 1 - 70 PERCENT ELIGIBILITY PROVISIONS

Pre-July 1, 2000 Requirements "OLD"		July 1, 2000 Requirements "NEW"	
Individual is currently receiving CalWORKs assistance.	<input type="checkbox"/> Yes	Individual is currently receiving CalWORKs assistance.	<input type="checkbox"/> Yes
Has received CalWORKs/TANF assistance for 30 months or more or will become ineligible for CalWORKs assistance within 12 months due to their federal 60-month lifetime limit on aid.	<input type="checkbox"/> Yes	Has received CalWORKs/TANF assistance for 30 months or more or will become ineligible for CalWORKs assistance within 12 months due to their federal 60-month lifetime limits.	<input type="checkbox"/> Yes
Has at least two of the following barriers to employment: <ul style="list-style-type: none"> Does not have a high school diploma or certificate of general equivalency and has reading or math skills at 8.9 or below. Requires substance abuse treatment for employment. Has a poor work history. 	<input type="checkbox"/> Yes	(No barrier requirement.)	

If ALL boxes are marked "yes" under both "OLD" and "NEW" requirements, the individual is eligible to be enrolled under the 70 percent provision and WtW Grant funds may be expended prior to October 1, 2000.

If the individual meets only the "NEW" requirements, WtW Grant funds may not be expended until October 1, 2000.

Pre-July 1, 2000 Requirements "OLD"		July 1, 2000 Requirements "NEW"	
Individual is no longer receiving CalWORKs/TANF assistance due to the federal 60-month lifetime limits on aid, but would otherwise be eligible for CalWORKs assistance. (Former recipient.)	<input type="checkbox"/> Yes	Individual is no longer receiving CalWORKs/TANF assistance due to the federal 60-month lifetime limits on aid, but would otherwise be eligible for CalWORKs assistance. (Former recipient.)	<input type="checkbox"/> Yes
Has at least two of the following barriers to employment: <ul style="list-style-type: none"> Does not have a high school diploma or certificate of general equivalency and has reading or math skills at 8.9 or below. Requires substance abuse treatment for employment. Has a poor work history. 	<input type="checkbox"/> Yes	(No barrier requirement.)	

If ALL boxes are marked "yes" under both "OLD" and "NEW" requirements, the individual is eligible to be enrolled under the 70 percent provision and WtW Grant funds may be expended prior to October 1, 2000.

If the individual meets only the "NEW" requirements, WtW Grant funds may not be expended until October 1, 2000.

TABLE 2 - NONCUSTODIAL PARENT 70 PERCENT ELIGIBILITY PROVISIONS

Pre-July 1, 2000 Requirements "OLD"		July 1, 2000 Requirements "NEW"	
Custodial parent of the noncustodial parent's minor child or the noncustodial parent's minor child is currently receiving CalWORKs/TANF assistance.	<input type="checkbox"/> Yes	At least <u>one</u> of the following criteria is met: <ul style="list-style-type: none"> • The minor child or the custodial parent of the noncustodial parents minor child has received CalWORKs/TANF assistance for 30 months or more, or will become ineligible for CalWORKs/TANF assistance within 12 months due to federal 60-month lifetime limits. • The minor child is eligible for or is receiving CalWORKs/TANF assistance. • The minor child received CalWORKs/TANF assistance in the 12-month period before the date of determination, but no longer receives assistance. • The minor child is eligible for or is receiving assistance under the Food Stamp program, the Supplemental Security Income program, Medicaid or the Children's Health Insurance Program. 	<input type="checkbox"/> Yes
Either the minor child or custodial parent has received CalWORKs/TANF assistance for 30 months or more, or the custodial parent will become ineligible for CalWORKs/TANF assistance within 12 months due to federal 60-month lifetime limits.	<input type="checkbox"/> Yes		
The noncustodial parent has at least two of the following barriers to employment: <ul style="list-style-type: none"> • Does not have a high school diploma or certificate of general equivalency and has reading or math skills at 8.9 or below. • Requires substance abuse treatment for employment. • Has a poor work history. 	<input type="checkbox"/> Yes	The noncustodial parent meets <u>one</u> of the following: <ul style="list-style-type: none"> • Unemployed. • Underemployed. • Having difficulty in paying child support. 	<input type="checkbox"/> Yes

If ALL boxes are marked "yes" under both "OLD" and "NEW" requirements, the noncustodial parent is eligible to be enrolled under the 70 percent provision and WtW Grant funds may be expended prior to October 1, 2000. NOTE: As of July 1, 2000, noncustodial parents must enter into a written or oral personal responsibility agreement no later than 30 days or, at the option of the operating entity, no later than 90 days after enrollment.

If the noncustodial parent meets only the "OLD" requirements, he/she cannot be enrolled in the WtW Grant program.

If the noncustodial parent meets only the "NEW" requirements, WtW Grant funds may not be expended until October 1, 2000.

TABLE 3 - 30 PERCENT ELIGIBILITY PROVISIONS

Pre-July 1, 2000 Requirements "OLD"		July 1, 2000 Requirements "NEW"	
Individual is currently receiving CalWORKs assistance or would otherwise be eligible for CalWORKs assistance if he/she had not reached their federal 60-month lifetime limit on aid.	<input type="checkbox"/> Yes	Individual meets <u>one</u> of the following four criteria:	<input type="checkbox"/> Yes
Has at least one of the following characteristics associated with or predictive of long term welfare dependence: <ul style="list-style-type: none"> • Dropped out of school. • Teenage pregnancy. • Poor work history. • Other locally defined characteristic. 	<input type="checkbox"/> Yes	1. Currently receiving CalWORKs assistance or would otherwise be eligible for CalWORKs assistance if he/she had not reached their federal 60-month lifetime limit on aid. <u>AND</u> Has at least one of the following characteristics associated with or predictive of long term welfare dependence: <ul style="list-style-type: none"> • Dropped out of school. • Teenage pregnancy. • Poor work history. • Other locally defined characteristic. 	
		2. Youth aged 18 to 24 who before attaining 18 years of age were recipients of foster care.	
		3. Currently receiving CalWORKs assistance and has significant barriers to self-sufficiency under criteria defined by the local Workforce Investment Board.	
		4. Custodial parents with income below 100 percent of the poverty line.	

If ALL boxes are marked "yes" under both "OLD" and "NEW" requirements, the individual is eligible to be enrolled under the 30 percent provisions and WtW Grant funds may be expended prior to October 1, 2000. Please note that the eligibility requirements under "OLD" are the same as criterion 1 under the "NEW" requirements.

If the individual meets only criteria 2, 3, or 4 under the "NEW" requirements, WtW Grant funds may not be expended until October 1, 2000.

TABLE 4 - NONCUSTODIAL PARENT 30 PERCENT ELIGIBILITY PROVISIONS

NOTE: Under the WtW Grant program amendments, noncustodial parents are not included under the 30 percent eligibility provision. They are eligible only under the 70 percent provisions.

Pre-July 1, 2000 Requirements 30 Percent "OLD"		July 1, 2000 Requirements 70 Percent "NEW"	
The custodial parent of the noncustodial parent's minor child is currently receiving CalWORKs/TANF assistance.	<input type="checkbox"/> Yes	At least <u>one</u> of the following criteria is met: <ul style="list-style-type: none"> The minor child or the custodial parent of the noncustodial parent's minor child has received CalWORKs/TANF assistance for 30 months or more, or will become ineligible for CalWORKs/TANF assistance within 12 months due to federal 60-month lifetime limits. The minor child is eligible for or is receiving CalWORKs/TANF assistance. 	<input type="checkbox"/> Yes
The noncustodial parent has at least one of the following characteristics associated with or predictive of long term welfare dependence: <ul style="list-style-type: none"> Dropped out of school. Teenage pregnancy. Poor work history. Other locally defined characteristic. 	<input type="checkbox"/> Yes	<ul style="list-style-type: none"> The minor child received CalWORKs/TANF assistance in the 12-month period before the date of determination, but no longer receives assistance. The minor child is eligible for or is receiving assistance under the Food Stamp program, the Supplemental Security Income program, Medicaid or the Children's Health Insurance Program. 	<input type="checkbox"/> Yes
		The noncustodial parent meets <u>one</u> of the following: <ul style="list-style-type: none"> Unemployed. Underemployed. Having difficulty in paying child support. 	

If ALL boxes are marked "yes" under the "OLD" 30 percent provisions and under the "NEW" 70 percent provisions, the noncustodial parent is eligible to be enrolled under the 70 percent provisions and WtW Grant funds may be expended prior to October 1, 2000. NOTE: Upon enrollment, the noncustodial parent must enter into a written or oral personal responsibility agreement no later than 30 days or, at the option of the operating entity, no later than 90 days.

If the noncustodial parent meets only the "OLD" 30 percent provisions, he/she would not be eligible to be enrolled in the WtW Grant program and funds cannot be expended.

If the noncustodial parent meets only the "NEW" noncustodial parent 70 percent provisions, WtW Grant funds cannot be expended until October 1, 2000.

TABLE 5 – “OLD” 30 PERCENT AND “NEW” 70 PERCENT

Pre-July 1, 2000 Requirements 30 Percent "OLD"		July 1, 2000 Requirements 70 Percent "NEW"	
Individual is currently receiving CalWORKs assistance.	<input type="checkbox"/> Yes	Individual is currently receiving CalWORKs assistance.	<input type="checkbox"/> Yes
Has at least one of the following characteristics associated with or predictive of long term welfare dependence: <ul style="list-style-type: none"> • Dropped out of school. • Teenage pregnancy. • Poor work history. • Other locally defined characteristic. 	<input type="checkbox"/> Yes	Has received CalWORKs/TANF assistance for 30 months or more or will become ineligible for CalWORKs assistance within 12 months due to their federal 60-month lifetime limits.	<input type="checkbox"/> Yes

If ALL boxes are marked “yes” under both 30 percent “OLD” and 70 percent “NEW”, the individual is eligible to be enrolled under the 70 percent provision and WtW Grant funds may be expended prior to October 1, 2000.

Pre-July 1, 2000 Requirements 30 Percent "OLD"		July 1, 2000 Requirements 70 Percent "NEW"	
Individual is no longer receiving CalWORKs assistance due to the federal 60-month lifetime limits on aid, but would otherwise be eligible for CalWORKs assistance. (Former recipient.)	<input type="checkbox"/> Yes	Individual is no longer receiving CalWORKs assistance due to the federal 60-month lifetime limits on aid, but would otherwise be eligible for CalWORKs assistance. (Former recipient.)	<input type="checkbox"/> Yes
Has at least one of the following characteristics associated with or predictive of long term welfare dependence: <ul style="list-style-type: none"> • Dropped out of school. • Teenage pregnancy. • Poor work history. • Other locally defined characteristic. 	<input type="checkbox"/> Yes		

If ALL boxes are marked “yes” under both 30 percent “OLD” and 70 percent “NEW”, the individual is eligible to be enrolled under the 70 percent provision and WtW Grant funds may be expended prior to October 1, 2000.